

Appln. No. 10/007,615
Amendment dated Feb. 15, 2005
Reply to Office Action of Nov. 15, 2005
Docket No. BOC9-2001-0039 (284)

REMARKS/ARGUMENTS

These remarks are submitted in response to the Office Action of November 15, 2005 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due.

Claims 1-4, 9-10, 12-13, 15-18, and 23 were rejected in the Office Action under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,092,044 to Baker, *et al.* (hereinafter Baker). Claims 5-6, 8, 14, 19-20, and 22 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Baker in view of U.S. Patent No. 6,363,342 to Shaw, *et al.* (hereinafter Shaw), and Claims 7, 11, and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Baker in view of U.S. Patent No. 5,850,629 to Holm, *et al.* (hereinafter Holm).

Claim Amendments

Applicants initially wish to express their appreciation for the Examiner's thorough and articulate reply to Applicants' previous response. The reply has greatly assisted Applicants in formulating the claim amendments set forth herein.

Independent Claims 1, 10, 15 have been amended to further clarify certain features of Applicants' invention. The amendments, as described herein, are supported throughout the Specification. (See, e.g., Specification, p. 8, line 25 – p. 10, line 6.) No new matter has been introduced by virtue of the amendments.

Applicants' Invention

It may helpful at this juncture to reiterate certain aspects of Applicants' invention. One embodiment of the invention, typified by Claim 1, as amended, is a computer-implemented method of composing a pronunciation. The method can include simultaneously presenting four different types of activatable identifiers. The first set of

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activatable visual identifiers presented can comprise a plurality of identifiers that each uniquely correspond to one of a plurality of phonemes. Each visual identifier of this first set, moreover, can comprise a label that identifies the corresponding phoneme and that provides an explanatory word representing a sound of the corresponding phoneme. (See, e.g., Specification, p. 8, lines 25-29; see also FIG. 2, especially elements 205.)

Each of the second set of activatable visual identifiers simultaneously presented can uniquely correspond to one of a plurality of prosodic parameters. (See, e.g., Specification, p. 9, lines 8-9.) Additionally, each visual identifier of this set also can have a label that specifically identifies the particular prosodic parameter to which it corresponds. (See, e.g., Specification, FIG. 2, especially element 215.) Each of the third set of activatable visual identifiers simultaneously presented can uniquely correspond to one of a plurality of pronunciation stress parameters. (See, e.g., Specification, p. 9, lines 9-10.) Likewise, each of these visual identifiers also can have a label, each such label identifying the corresponding pronunciation stress parameter.

The fourth set of activatable visual identifiers simultaneously presented can comprise a plurality of identifiers that each corresponds to one of a set of actions. The actions can include an adding action, a removing action, and a reordering action. By sequentially activating the action-designating visual identifiers in combination with the other visual identifiers, a user can compose a pronunciation. Specifically, a phoneme, prosodic parameter, and/or pronunciation stress parameter can be added or deleted by the user's activating a visual identifier corresponding to the phoneme or parameter and also activating the particular visual identifier corresponding to the action to be performed regarding the phoneme or parameter. The result of a combination of such activations is the construction of a pronunciation that can be simultaneously presented in the single display.

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Accordingly, the method can further include, responsive to a selection of at least one of the visual identifiers, generating pronunciation information in accordance with the selected visual identifier. The pronunciation information can thus include a phoneme selected from the plurality of phonemes, an ordering of selected phonemes, a pronunciation stress parameter, and/or a prosodic parameter;

The pronunciation can be composed or created, according to the method, based upon the pronunciation information and an audible rendering of a portion of the pronunciation during a user's composing the pronunciation and without compiling the pronunciation information. The method can further include providing an audible rendering of an exemplary word illustrative of a particular phoneme, as well as a visual rendering of an exemplary word illustrative of the particular phoneme. The method further can include compiling the pronunciation information responsive to a selection of a visual identifier.

The Claims, As Amended, Define Over The Prior Art

Independent Claims 1, 10, and 15, as already noted, were rejected as being anticipated by Baker. Baker, as noted at page 3 of the Office Action, discloses a method of generating a pronunciation by "directly typ[ing] the pronunciation into [a pronunciation] box."

In assessing whether Baker's method is accomplished "through 'activatable visual identifiers corresponding to individual ones of a plurality of phonemes'," reference is made in the Office Action to Baker's "phoneme table." As noted in the Office Action, Baker provides only a very brief description of the action generated by activation of the phoneme table button: "Activating a phoneme table button 68 [sic, 1768] opens a table containing valid phonemes." (Col. 18, lines 49-51; see also FIG. 17.) No further description regarding the phoneme table button is provided in Baker. Ostensibly,

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however, Baker's phoneme table is the one illustrated in the reference. The illustrated table comprises a two-column list. (See FIG. 20.) The left-hand column is a list of sixty one single-character key strokes; the right-hand column comprises the corresponding phonemes, each corresponding to one of the single-character key strokes of the left-hand column.

Applicants respectfully assert that neither the phoneme table button nor the phoneme table itself in Baker explicitly or inherently teaches presenting a display of a plurality of activatable visual identifiers wherein each of the visual identifiers uniquely corresponds to one of a plurality of phonemes, as recited in each of the amended independent claims. Instead, Baker presents only one activatable visual identifier associated with a plurality of phonemes, namely, the phoneme table button 1768. Activating the phoneme table button merely "opens" the phoneme table of Baker. (Col. 18, lines 49-51.) None of the elements of the phoneme table, however, are activatable visual identifiers themselves. If a user in Baker wishes to add a phoneme in constructing a pronunciation, the user must access the table, locate the desired phoneme in the table, identify the corresponding keystroke, and finally type the appropriate keystroke into the pronunciation box 1756.

Baker likewise nowhere teaches graphically presenting activatable visual identifiers corresponding to prosodic parameters, which are simultaneously presented with the activatable visual identifiers corresponding to the plurality of phonemes. Nor does Baker teach presenting still another set of activatable visual identifiers corresponding to pronunciation stress parameters, this set of activatable visual identifiers being presented simultaneously with the activatable visual identifiers corresponding to the phonemes and prosodic parameters. Lastly, Baker does not teach, expressly or inherently, simultaneously displaying yet a fourth set of visual identifiers along with the other three sets of visual identifiers, wherein each of the activatable visual identifiers of

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the fourth set corresponds to one of a set of actions for adding, removing, and/or reordering phonemes, prosodic parameters, and pronunciation parameters.

Accordingly, Baker does not enable a user to add, remove, and/or reorder phonemes merely by activating one a plurality of simultaneously presented activatable visual identifiers, each uniquely corresponding to one of a plurality of phonemes, and by activating an action-directing activatable visual identifier that is also simultaneously presented. Instead, as already noted, Baker requires a user to open a table of phonemes and ultimately type in a keystroke selected from those presented in the table. Likewise Baker does not enable a user to add and/or remove a prosodic parameter or a pronunciation stress parameter merely by activating one of a plurality of visual identifiers, each uniquely corresponding to a plurality of parameters, and by activating an action-directing activatable visual identifier also simultaneously presented with the visual identifiers corresponding to the plurality of parameters. The activatable visual identifiers in Applicants' invention are sufficient for composing a pronunciation, which is presented in the same display that the activatable visual identifiers are simultaneously presented. Baker does not provide this capability.

The specific graphical display presented in Baker includes a word box 1752 in which a user types a word, and a pronunciation box 1756 in which a user directly types in a pronunciation or edits one already contained therein. (Col. 18, lines 5-6 and FIG. 17.) As already noted, the display in Baker presents only a single activatable visual identifier corresponding to phonemes, namely the phoneme table button. The graphical display in Baker also includes an add button 1758, a next-word button 1764, and a previous-word button 1766. None of the additional buttons provided in Baker pertain to prosodic parameters or pronunciation stress parameters, however. Indeed, these additional buttons presented in Baker's graphical user interface have nothing to do with the composing of a pronunciation of a word. Instead, the additional buttons pertain to the words presented in

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the word box 1752 for which a pronunciation is sought. (See Col. 18, lines 8-10 and 45-47.)

It follows that since Baker does not simultaneously display a plurality of activatable visual identifiers corresponding to pluralities of phonemes, prosodic parameters, or pronunciation parameters, Baker also does not teach the additional features associated with the activatable visual identifiers presented with Applicants' invention. Specifically, Baker does not teach, expressly or inherently, presenting activatable visual identifiers corresponding to phonemes, wherein each such activatable visual identifier has a label indicating both the corresponding phoneme activated by the particular visual identifier and an explanatory word representing a sound of the corresponding phoneme, as expressly recited in each of the amended claims.

Baker likewise does not expressly or inherently teach presenting activatable visual identifiers corresponding to prosodic parameters, wherein each such activatable visual identifier has a label indicating the corresponding prosodic parameter activated by the particular visual identifier. Nor does Baker teach, expressly or inherently, presenting activatable visual identifiers corresponding to pronunciation stress parameters, wherein each such activatable visual identifier has a label indicating the corresponding pronunciation stress parameter activated by the particular visual identifier, as also expressly recited in each of the amended claims. In fact, by only affording a user the opportunity to type phoneme representations into a pronunciation box 1756, Baker does not address how a user further provides prosodic or pronunciation parameters along with phonemes in composing a pronunciation, let alone by providing them simply by activating visual identifiers.

Moreover, Baker's phoneme table provides only a purely textual listing of phonemes. (See FIG. 20.) Not only must these textual representations be typed in to Baker's pronunciation box 1756, as already noted, but, moreover, Baker's lack of an

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activatable visual identifier for each distinct pronoun precludes graphically displaying with a visual identifier the true graphical, as opposed to textual, representation according, for example, to the International Phonetic Alphabet. By contrast, Applicants' invention provides a simultaneous display of a plurality of visual activatable identifiers, each of which can be labeled with the true corresponding graphical representation to which the particular activatable visual identifier corresponds. (See FIG. 2)

Accordingly, for each of the reasons stated herein, Baker fails to expressly or inherently teach every feature recited in independent Claims 1, 10, and 15, as amended. Applicants respectfully maintain, therefore, that amended independent Claims 1, 10, and 15 define over the prior art. Applicants further respectfully maintain that whereas each of the other claims depends from one of the amended independent claims while reciting additional features, these claims likewise define over the prior art.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

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